

facilities or engineering problems necessitate delaying the cutover. Regardless of whether a customer decides to delay cutover or whether provisioning problems require a delay in the cutover, CLEC customers should not have to risk service interruption in the conversion process.

73. Customers neither understand, nor care, that BellSouth, not SMNI, controls the service disconnection process. They care only about the loss of business and productivity that results when their local telephone service does not function properly. These service outages damage SMNI's reputation and impede its ability to establish and expand its competitive local service offerings in central Florida. Moreover, the outages diminish consumer confidence in the operational integrity of competitive local exchange providers and serve as a deterrent to switching to a CLEC's service. As such, it will be impossible for local exchange service competition to flourish in the current environment in which unbundled loop provisioning processes are unable to produce consistently acceptable performance levels.
74. Sprint believes that inappropriate service disconnection is just one example demonstrating that the fundamental processes supporting the provisioning of service using unbundled network elements are in a highly developmental state. These processes do not enable CLECs to provide service at parity with what BellSouth provides to its own retail customers and they do not provide CLECs with a reasonable opportunity to compete.

Cutover Problems Due to BellSouth Facilities Issues

75. An example impacting two customers further demonstrates BellSouth's lack of effective processes for provisioning unbundled network elements and how that lack is impacting SMNI's ability to cutover customers in a timely manner. In this scenario, unbundled loop orders were delayed due to BellSouth "facility problems". After receipt of these orders, BellSouth discovered that its physical facility configuration used in providing service to a customer would not permit BellSouth to re-use the existing facilities. The configuration involved the provisioning of service using a Digital Access Cross Connect -mapped Integrated Subscriber Line Concentrator ("DACS-mapped Integrated SLC"). This equipment is used to maximize usage of the physical facilities extending to customer premises. BellSouth advised SMNI that its automated systems were unable to process, assign and work the orders, meaning that their systems and processes did not support reuse of the existing facilities. While SMNI agreed that construction of new facilities would be costly and inefficient, BellSouth was reluctant to process these customer orders because manual procedures would be required and it might "set precedent" by agreeing to provision competitive services utilizing non-standard procedures. One of the customers was so frustrated by the delay that he, at his own expense, purchased a digital trunk interface ("DTI") card for his PBX which enabled a different type of special circuit to be used to provision his service. Correct orders for these customers' services were sent to BellSouth on September 13, 1996, and March 6, 1997 respectively. Only after Sprint escalated this situation to BellSouth executives were the services installed in early May, 1997 using "work-around" procedures.

76. As another example of BellSouth's failure to provide timely notification to SMNI of facilities issues, SMNI submitted an Access Service Request ("ASR") on August 1 of this year for a DS1 circuit with a customer desired due date ("CDDD") of August 11. On August 8, BellSouth informed SMNI that facilities were not available for the scheduled cutover. BellSouth requested that the installation be postponed. Because business customers traditionally need to schedule service migrations to accommodate business operational requirements, the installation date had to be re-negotiated with the customer. BellSouth's failure to provide timely notification of the facilities problem caused SMNI to miss its August 11 due date commitment. The service was installed August 15.
77. Sprint had advised BellSouth of its concerns regarding the provisioning scenario referenced in paragraph 75 in its April 18 letter (Exhibit "A"). BellSouth's response in a letter dated May 2, 1997 and attached as Exhibit "F", indicated that resources had been assigned to study this issue and that it involved a "non-standard procedure that involves manually provisioning circuits without a service order." BellSouth's May 23, 1997 letter, Exhibit "G", further addressed this issue and noted that new procedures to accommodate this provisioning configuration were under development and were expected to be put into place by June 21, 1997. To date, Sprint has not been advised of any new procedures, but instead, must work with BellSouth to "hand walk" customers through the provisioning process when the customer is provisioned via this network configuration.
78. The processes utilized by BellSouth have resulted in unacceptable installation delays. While there have been modest improvements in installation intervals, lengthy delays in cutting over customers still persist.

79. For example, an ordering problem occurred when BellSouth twice issued its internal orders for one unbundled loop incorrectly, resulting in an eighteen-day installation interval and an executive complaint from the customer.
80. BellSouth has repeatedly failed to notify SMNI in a timely manner of facilities issues which prevent SMNI from meeting its customer's desired due date. These facilities issues include facilities shortages or any number of engineering design problems which prevent SMNI's service orders from being completed.
81. When BellSouth fails to provide timely notification of facilities problems which will impact due dates, SMNI must contact its customers to tell them that installation of SMNI service must be delayed. These incidents cause SMNI to appear inept and unresponsive to its customers. It further inconveniences SMNI customers since they must re-schedule work activities, and in some cases, other vendors, around the revised service installation date.
82. In one instance, a customer that moved was without service for a day and had only two of fourteen lines operational for another day primarily because BellSouth failed to identify a facilities shortage problem until the Friday before the scheduled Monday cutover. Sprint executive escalations were required to secure commitments to complete the service installation at the end of the second day. BellSouth has suggested that SMNI's late submission of service orders significantly contributed to BellSouth's inability to install service for this customer on the date requested. Service order records, however, reflect that the original orders for this customer were placed with BellSouth fourteen days prior to the customer's move date. The service orders were revised twice when Sprint was advised, during Sprint-initiated follow-up calls to BellSouth for status, that there were errors on the

orders that needed to be corrected so that the service orders could be processed. Sprint corrected the orders immediately, but was unaware of one remaining error until Friday before the Monday order due date. Only then did BellSouth advise Sprint of its facilities problem.

Other Operational Problems

83. A maintenance problem emerged when an SMNI customer that is served via a direct fiber connection to SMNI's fiber optic backbone network began experiencing interrupted or degraded data transmission capability. Investigation into the trouble report revealed that several BellSouth trunk groups recently added to support increased tandem-to-tandem call volume had been incorrectly provisioned, and were lacking proper optioning for data transmission as was requested on the service orders submitted.
84. SMNI's wholesale bill has also been rendered incorrectly by BellSouth every month it has been issued. While BellSouth has repeatedly stated in testimony in conjunction with Section 271 proceedings that the billing problems have been resolved, SMNI continues to this date to discover errors. Once again, this problem is relevant to CLECs serving customers in South Carolina, given that BellSouth's systems supporting CLECs are not state-specific and will impact BellSouth's entire nine-state region. BellSouth's failure to issue accurate wholesale bills increases SMNI's operational costs and further discourages Sprint from entering new markets on a wide-scale basis.

Local Number Portability Problems

85. SMNI has also experienced service interruptions on numerous occasions resulting from BellSouth call routing errors, translations problems and failure to properly provision and implement interim number portability. These failures prevent calls from being completed to SMNI customers. Such incidents have created customer dissatisfaction and have tarnished SMNI's reputation as a reliable service provider.
86. On Monday morning, May 19, 1997, BellSouth began implementation of a trunking reconfiguration project, which was intended to provide additional call routing capacity between the SMNI and BellSouth networks. BellSouth reversed the routing instructions for interoffice trunking in error, creating an "all circuits busy" condition for callers trying to reach SMNI customers. Customers were impacted for three hours and SMNI received a number of trouble tickets.
87. Another incident on May 30, 1997, revealed a translations problem in a BellSouth local switch whereby calls processed via the primary route were completed but the secondary route returned "no longer in service" or "can't be completed as dialed" messages. This service problem occurred for at least seven hours before it could be isolated and resolved by BellSouth.
88. On June 6, 1997, a Simulated Facilities Group ("SFG") that contains network instructions for Local Number Portability functionality was taken out of service in error. This resulted in calls placed to SMNI customers being blocked for more than two hours. These service-impacting incidents were communicated to BellSouth via the standard trouble-reporting

process as well as via personal telephone conversations with BellSouth's Sprint Account Team and maintenance personnel.

89. On June 18, 1997, George Head, Sprint Vice President-Local Market Integration, sent a letter, attached as Exhibit "H", to Joe Baker, BellSouth vice President Sales-Interconnection Services, in which he expressed concern about the damage these incidents caused to SMNI's ability to establish itself as a local service competitor.
90. These concerns were further reinforced at the executive level meeting referenced earlier, which was conducted at BellSouth's Birmingham offices on June 24, 1997.³ At 5:00 p.m. on June 24, however, BellSouth once again took SFG instructions out of its systems in error, causing an identical situation to the June 6 incident in which calls to SMNI customers who were provisioned using Local Number Portability could not be completed. Every SMNI customer with Local Number Portability served by the BellSouth switch in question was impacted by this outage.
91. The translations errors in these incidents have been corrected and the Simulated Facilities Groups have been restored. However, the underlying permanent process corrections necessary to prevent future occurrences are still being addressed. For Simulated Facilities Groups, BellSouth has advised Sprint that a system modification is required to prevent inadvertent manual intervention with respect to SMNI's translations tables. Without this modification, there is still risk of reoccurrence which would cause further service interruptions. While we understand that BellSouth is working diligently to prevent future errors, these service interruptions and the associated process deficiencies further

³ Additional correspondence between Sprint and BellSouth relative to the ongoing operational problems experienced are attached as Exhibit "I".

demonstrate that the fundamental processes to effectively support the provisioning of unbundled network elements are in a highly developmental state and are currently incapable of producing consistently acceptable performance levels.

93. Moreover, these examples illustrate the total dependence of even a facilities-based CLEC such as SMNI on the integrity and accuracy of BellSouth's processes and systems in providing quality service to its customers.
94. As a final example, a SMNI customer returned his service to BellSouth on July 7, 1997, following provisioning delays and repeated service interruptions caused by BellSouth. To recap this customer's service experience, the customer's initial service cutover was postponed by BellSouth due to a facilities shortage. At cutover, BellSouth engineering problems caused an additional installation postponement. Two months later, this customer experienced a service interruption due to a BellSouth "open jumper." On three separate additional occasions, the customer could not receive calls due to BellSouth network routing errors related to call routing and Local Number Portability. After his service failed again July 3 due to a "bad card" on the BellSouth side of a demarcation hand-off between SMNI and BellSouth, the customer requested that his service be returned to BellSouth. The customer was taken out of service again by BellSouth for over a half day in the process of being switched back to BellSouth.
95. Based on the experiences described above, Sprint does not believe that BellSouth is satisfying the checklist requirement to provide nondiscriminatory access to network elements.

96. Moreover, this operationally unstable and burdensome environment prevents Sprint from expanding its marketing efforts due to the inherent risks to its customers and to Sprint's reputation and brand name.

Sprint's Complaint with the Florida Commission

97. Because of the above described problems, as well as others, Sprint filed a formal Complaint against BellSouth with the Florida Public Service Commission on October 10, 1997, alleging several specific failures by BellSouth as follows:

- a) BellSouth has failed to provide firm order confirmation in a timely and accurate manner to enable SMNI to install service at intervals comparable to what BellSouth provides to its retail customers.
- (b) BellSouth has failed to identify provisioning problems in a timely manner to enable SMNI to meet customer desired due dates consistent with the service provided by BellSouth to its retail customers;
- c) BellSouth has disconnected customers seeking to migrate to SMNI service prior to the designated cutover date; and
- d) BellSouth has caused service interruptions to SMNI customers. These service interruptions have resulted in SMNI customers being unable to receive incoming calls and in some cases have also resulted in SMNI customers being unable to make outgoing calls.

The Role of Performance Measurements in Evaluating Nondiscrimination and Parity Compliance

98. As stated previously, the competitive checklist in Section 271(c) of the Act includes nondiscriminatory access to network elements. Included in this requirement for nondiscriminatory treatment are OSS, which have been defined as network elements by the FCC in its First Report and Order in CC Docket No. 96-98. Nondiscrimination, sometimes referred to as parity, is a prevalent theme throughout the Act and the FCC's first Report and Order. It is the standard that has been set to insure an environment is created that is conducive to competition.
99. Sprint's position is that BellSouth's performance in providing nondiscriminatory access to network elements can only be properly evaluated through documented results in accordance with specifically defined performance measures. Moreover, the current operational environment for CLECs served by BellSouth does not provide nondiscriminatory access to network elements as previously described in this affidavit.
100. Written statements about the expected performance levels of operational support systems and other processes supporting network element utilization are just that--- written statements. They offer no empirical evidence upon which a fact-based evaluation of nondiscriminatory treatment can be conducted.
101. Sprint supports the development of unified nationwide measurement categories and methodologies, such as common definitions and calculation formulas, as will be required to monitor and evaluate the nondiscrimination and parity obligations of ILECs as described in Section 251 of the Act. Such measurements should compare the ILEC's performance in

support of its retail operations to the ILEC's support of its affiliates, individual CLECs and the CLEC industry.

102. These measurements should encompass all essential OSS categories, including pre-order, ordering and provisioning, maintenance and repair, network performance, unbundled elements, operator services and directory assistance, system performance, service center availability and billing. Moreover, such measures must have common nationwide definitions and calculation methodologies. Consistent measurements will allow state commissions to easily monitor results across state boundaries to ensure nondiscriminatory treatment for their constituents.
103. In the absence of directly comparative ILEC results, benchmark levels of performance should be established based upon "best of class" performance and an assessment of the performance level necessary to give CLECs a meaningful opportunity to compete. The measures employed must demonstrate that nondiscriminatory access is being delivered across all interfaces and a broad range of resold services and unbundled elements. The measures must also address availability, timeliness of execution and accuracy of execution.
104. It is also important to note that such parity considerations will change from month to month and over time as normal process improvements drive positive change in the levels of support afforded CLECs.
105. Sprint's position is consistent with the Local Competition User's Group ("LCUG") "Service Quality Measurements" recommendation presented on September 26, 1997, to the FCC. It is Sprint's belief that benchmarks and performance standards are necessary to provide factual evidence that CLECs are receiving treatment at least equal to that provided to an

ILEC's own retail operations or local service affiliates. Such documentation of performance will be the only true indicator of whether BellSouth is fulfilling its nondiscrimination and parity obligations.

Status of BellSouth Performance Measurements

106. It is Sprint's understanding that initial negotiation of performance measures between BellSouth and AT&T were concluded in early May, 1997, and that the parties agreed that there were additional measures yet to be defined. BellSouth also states in Mr. Stacy's Affidavit in this docket, in paragraph 28, "A similar agreement was reached with Time Warner on September 5, 1997." He also says; "BST is willing, and in fact continues to negotiate performance measurement obligations with other CLECs." Actual performance data for those CLECs who have completed negotiation with BellSouth of performance measures to be reported was published, according to BellSouth, for the first time in September, 1997.
107. Sprint's recently filed interconnection agreements with BellSouth in Florida, Georgia and North Carolina state that the parties shall mutually agree on specific quality measurements within 45 days of the agreements' approval. Accordingly, Sprint is continuing its negotiation of performance measurements with BellSouth.
108. Sprint further understands that the systems modifications necessary to actually capture performance element measures and produce reports have been initiated but not yet completed. Indeed, BellSouth has noted its agreements with two CLECs with regards to

performance measurements to be tracked and reported but has provided no evidence showing that the capabilities to track and report each of these measures exists today.

109. Sprint's own experience with SMNI provides an illustration of the status of BellSouth's implementation of performance measurements, and the uncertainty surrounding the level of performance measurement reporting capabilities which are actually in place today.
110. As of this date, SMNI has not been provided any information relative to BellSouth's performance in support of the pre-order, ordering, provisioning or maintenance of services purchased from BellSouth.
111. Sprint has requested that performance measurement information be provided relative to BellSouth's support of the Orlando facilities-based operation. BellSouth indicated to Sprint in a June 24, 1997, meeting with BellSouth at its offices in Birmingham, Alabama, that the supporting systems and processes needed to capture and produce the performance measurements data were still being developed. At that meeting, BellSouth committed to reporting back to Sprint as to which performance elements could currently be captured and reported. BellSouth's response relative to this commitment was received by Sprint on July 23, 1997. BellSouth did not respond directly as to what capabilities BellSouth currently possesses to capture and report performance measurements. Rather, Sprint was referred back to BellSouth's negotiating team to finalize negotiations on what performance measurements data BellSouth would be willing to provide as part of Sprint's interconnection agreement with BellSouth. Accordingly, Sprint still has been provided no information about BellSouth's current capabilities to capture and report its performance in support of SMNI unbundled network element ordering, provisioning and maintenance processes.

112. Sprint believes that a review of the evidence presented by BellSouth in this proceeding clearly demonstrates that there is currently very little empirical data relative to BellSouth's support of CLECs in South Carolina. What is available is extremely limited in its scope and falls seriously short of providing the meaningful range of data necessary for this Commission to conclude that BellSouth has met its nondiscrimination and parity obligations.

113. The FCC's Order in CC Docket No. 97-137, Application of Ameritech Michigan Pursuant to Section 271 of the Communications Act of 1934, as Amended, To Provide In-Region, InterLATA Services in Michigan (issued August 19, 1997), outlines in paragraphs 133-168 how to determine whether an RBOC's OSS adequately meet the obligations set forth in Section 271 of the Act. Specifically, evidence needs to be developed on installation intervals for BellSouth's retail services versus CLEC services.

114. In paragraph 171, the FCC further notes:

In sum, we find that submission of data showing average installation intervals is fundamental to demonstrating that Ameritech is providing nondiscriminatory access to OSS functions. Such data is direct evidence of whether it takes the same time to complete installations for competing carriers as it does for Ameritech, which is integral to the concept of equivalent access. By failing to provide such data in this application, Ameritech has failed to meet its evidentiary burden.

115. BellSouth has not provided adequate evidence regarding average installation intervals in this application. A review of Mr. Stacy's Exhibit WNS-10 reveals data for what appear to be only basic business and residential resold services. This represents a small fraction of the service types required by CLECs from BellSouth. Moreover, no comparative performance information for unbundled network elements is provided as was deemed necessary by the FCC in paragraph 212 of the aforementioned Ameritech Order.

116. In addition to the lack of order installation interval evidence, Mr. Stacy, in paragraph 52 of his Affidavit, has further conceded, "BST has not agreed to incorporate this data in the results regularly produced for the CLECs or state commissions, since the set of % Provisioning Appointments Met data already indicates BST's performance in this area." Accordingly, BellSouth falls further short of this Commission's standard in that it has not even agreed to support this key measure necessary to demonstrate parity going forward.

117. In addition, BellSouth has failed to provide empirical data on other key elements required before its application for authorization into in-region InterLATA services should be approved. These elements are summarized in paragraph 212 of the FCC's Ameritech Order:

We therefore conclude that, in order to provide us with the appropriate empirical evidence upon which we could determine whether Ameritech is providing nondiscriminatory access to OSS functions, Ameritech should provide, as part of a subsequent section 271 application, the following performance data, in addition to the data that it provided in this application: (1) average installation intervals for resale; (2) average installation intervals for loops; (3) comparative performance information for unbundled network elements; (4) service order accuracy and percent flow through; (5) held orders and provisioning accuracy; (6) bill quality and accuracy; and (7) repeat trouble reports for unbundled network elements."

118. The data provided by BellSouth in its South Carolina application before this Commission falls short in each area. No data is provided for measures #2-6 and installation intervals for measures #1 and #2 are incomplete as described above. Data is provided for measure #7, repeat trouble reports for unbundled network elements, but the data lacks relevance to an evaluation of these proceedings since Mr. Stacy's Exhibit WNS-3, page 2, shows that there are no unbundled loops in service in South Carolina today.

119. In summary, BellSouth has not provided adequate empirical performance data in its application for in-region interLATA authorization in South Carolina to enable this Commission to conduct a fact-based evaluation of BellSouth's Section 271 compliance.
120. The key point is that until these performance measurements are captured, reported and evaluated based on actual performance in serving CLEC customers, a factual determination of whether BellSouth is treating CLECs on a nondiscriminatory basis can not take place.

Conclusion

121. BellSouth's current OSS do not meet the nondiscriminatory access standard, nor do they provide CLECs with a meaningful opportunity to compete. The OSS lack full electronic flow-through to CLECs' OSS, require manual intervention for numerous product and service types and with the exception of the EDI transmission protocol, are not based on industry standards. In particular, Sprint's experience has demonstrated that BellSouth's OSS for unbundled network elements mandate substantial manual processing, multi-system access and constant follow-up to accomplish even a small number of service orders. They clearly do not provide parity with BellSouth's own capabilities in serving its retail customers.
122. Measurement of BellSouth's performance in providing nondiscriminatory access to OSS and other network elements is in its infancy. What measurements do exist address a very limited set of parameters, do not encompass those measures specifically required by this Commission in its Ameritech Order, and are insufficient for this Commission's evaluation of BellSouth's ability to meet its nondiscrimination and parity obligations. BellSouth currently

offers written statements about expected performance levels and measures it intends to track. These written statements are not equivalent to demonstrating through empirical data that these targets can be consistently met. Actually meeting the targets on a consistent basis is the only true indicator upon which a fact-based evaluation of nondiscriminatory treatment can be conducted. BellSouth currently does not meet this, or the Commission's own articulated standard in this area.

123. Finally, perhaps the true test of BellSouth's ability to meet its nondiscriminatory access and parity obligations is whether CLECs can utilize BellSouth's processes, OSS interfaces and network infrastructure to provide quality service to end user customers. Sprint's experience through SMNI unambiguously demonstrates that the processes are immature, that the OSS interfaces are manually intensive, substantively deficient and ineffective, and that the network infrastructure has not been adequately prepared for doing business with CLECs. Aside from the excessive operating costs, lost customers and lost revenues that have resulted, Sprint has suffered damage to its reputation and brand name and can not proceed with market expansion plans given the current environment. These experiences reflect BellSouth's failure to provide nondiscriminatory access to network elements and its failure to provide CLECs with a meaningful opportunity to compete.
124. BellSouth should not be granted authorization to offer in-region interLATA services in South Carolina until it can empirically demonstrate to this Commission that it can meet its Section 271 obligations. Sprint emphatically believes that BellSouth can not do so today.

STATE OF FLORIDA

COUNTY OF _

VERIFICATION

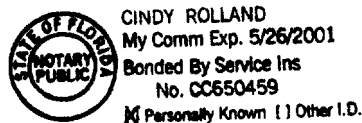
I, Melissa L. Closz, first being duly sworn, state on my oath that I am Director - Local Market Development for Sprint Communications Company L.P. ("Sprint"). I am authorized to act on behalf of Sprint regarding the foregoing statement. I have read the aforesaid statement and I am informed and believe that the matters contained therein are true and correct to the best of my knowledge.

Dated: October 17, 1997.


Melissa L. Closz

Melissa L. Closz appeared, and being first duly sworn upon her oath stated that she is the Director - Local Market Development, that she signed the foregoing document in that capacity and the facts contained therein are true and correct according to the best of her knowledge.

IN WITNESS THEREOF, I have set my hand and affixed my official seal in the aforesaid county and state on the above date.




Notary Public

My Commission Expires: 5/26/2001

BellSouth FOC Problems

April 1997

APRIL 1997

FOC PROBLEMS (OVER 48 HOURS)

(FOC = Firm Order Confirmation)

(ASR = Access Service Request)

(PON = Purchase Order Number)

Total ASRs Submitted: 19

Total FOCs Received Within 48 Hours: 1

Percent of FOCs Received Within 48 Hours: 5%

CUSTOMER	PON	ASR TO BELL	FOC RECEIVED		
Customer A	N001895	04/04/97	04/10/97	5	05/12/97
Customer B	N001800	04/16/97	04/21/97	4	05/20/97
Customer C	N002008	04/24/97	04/28/97	3	04/28/97
Customer D	N001100A	04/02/97	04/10/97	6	04/28/97
Customer E	N001100	04/02/97	04/10/97	7	04/28/97
Customer F	N001574	04/07/97	04/11/97	5	04/28/97
Customer G	N004310	04/14/97	04/18/97	5	06/20/97
Customer H	N006062B	04/10/97	04/16/97	5	04/28/97
Customer I	N000155	03/31/97	04/08/97	7	04/28/97
Customer J	N010883	04/07/97	04/14/97	6	05/20/97
Customer K	N005280	04/10/97	04/15/97	4	04/28/97
Customer L	N006462	04/16/97	04/21/97	4	04/28/97
Customer M	N007200A,B	03/17/97	04/09/97	18	04/28/97
Customer N	N007491	04/04/97	04/09/97	4	04/28/97
Customer O	N004576	04/04/97	04/09/97	4	04/28/97
Customer P	N00744A	04/01/97	04/09/97	7	04/28/97
Customer Q	C000555	04/14/97	04/22/97	7	04/28/97
Customer R	N005200	04/08/97	04/16/97	7	04/24/97

May 1997

FOC PROBLEMS (OVER 48 HOURS)

(PON = Purchase Order Number)

Percent of FOCs Received Within 24 Hours: 50%

[illegible]

BellSouth FOC Problems

June 1997

June 1997

FOC PROBLEMS (OVER 48 HOURS)

(FOC = Firm Order Confirmation)

(ASR = Access Service Request)

(PON = Purchase Order Number)

Total ASRs Submitted: 15

Total FOCs Received Within 48 Hours: 4

Percent of FOCs Received Within 48 Hours: 27%

Customer	PON	ASR TO BE FIXED	FOC RECEIVED		
Customer A	barr.ds1	06/24/97	06/26/97	3	06/24/97
Customer B	N002861	05/23/97	06/02/97	6	06/02/97
Customer C	centralst.ds0	06/17/97	06/27/97	9	06/27/97
Customer D	N005750	05/30/97	06/04/97	4	06/04/97
Customer E	N005052	06/05/97	06/09/97	3	06/09/97
Customer F	N007900A	06/05/97	06/11/97	5	07/01/97
Customer G	lakehi.ds0	06/17/97	06/23/97	4	07/01/97
Customer H	N007900B	06/05/97	06/11/97	5	07/01/97
Customer I	story.dso	06/05/97	06/11/97	5	07/01/97
Customer J	N009146	06/11/97	06/25/97	11	06/25/97
Customer K	C009145/46	06/11/97	06/20/97	11	06/27/97

July 1997

July 1997

FOC PROBLEMS (OVER 48 HOURS)

(ASR = Access Service Request)

(PON = Purchase Order Number)

Total FOCs Received Within 48 Hours: 6

Percent of FOCs Received Within 48 Hours: 60%

[illegible]

August 1997

FOC PROBLEMS (OVER 48 HOURS)

(PON = Purchase Order Number)

Percent of FOCs Received Within 48 Hours: 54%

[illegible]

BellSouth FOC Problems

September 1997

September 1997

FOC PROBLEMS (OVER 48 HOURS)

(FOC = Firm Order Confirmation)

(ASR = Access Service Request)

(PON = Purchase Order Number)

Total ASRs Submitted: 12

Total FOCs Received Within 48 Hours: 7

Percent of FOCs Received Within 48 Hours: 58%

^ This was a verbal FOC, paper not received.

* BellSouth did not submit FOC due to their policy on Access orders. When BellSouth receives an order for access service instead of an unbundled loop, the order is worked through BellSouth's ICSC Department. The ICSC Department's policy is not return FOC, when the request is 0-4 days prior to the migration date. Instead, they commit to expedite processing the order the day the order is received and Sprint is to be notified 24 hours prior to the migration date of any facility problems.

If BellSouth receives an order for access service (which will be worked by their ICSC Department) 5 days or more prior to the migration date the ICSC Department will then issue an FOC. As detailed, in September's Facility Problems, BellSouth's system is flawed, as they failed in their commitment to notify Sprint 24 hours prior to migration of facility problems. Therefore, without receipt of an FOC when any ASR is submitted to BellSouth, Sprint cannot be guaranteed of facility availability prior to migration date.

CUSTOMER	Customer PON	Migration Date	FOC Received	Days Before Migration	FOC Received Date
Customer A	Control.bri	09/15/97	09/18/97	3	09/18/97
Customer B	N001950	09/25/97	09/29/97	4	09/29/97
^Customer C	NSIGT10	09/28/97	10/01/97	5	10/01/97
*Customer D	OTC.ds1	09/23/97	NO FOC	*Did not receive FOC	10/01/97
*Customer E	Access.ds1	09/12/97	No FOC	* Did not receive FOC	09/22/97



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April 18, 1997

**Ms. Carol Jarman
Director
BellSouth Interconnection
Suite 440
Two Chase Corporate Drive
Birmingham, Alabama 35244**

Dear Carol:

While we were optimistic after our January 23 meeting with BellSouth's Account Team serving Sprint that service order and installation processes would improve, Sprint Metropolitan Networks (SMNI) continues to experience delays with the majority of its orders placed with BellSouth. I am writing to request your assistance in quickly addressing several issues associated with these delays which have resulted in missed SMNI service installation commitments on multiple occasions.

First, BellSouth continues to miss its commitment to SMNI to return Customer Service Record (CSR) requests and Firm Order Confirmations (FOCs) within 48 hours of receipt. It is the exception when a CSR or FOC is returned in 48 hours. Usually, a follow-up call must be placed by SMNI to inquire as to status and to escalate the request for CSR or FOC return. As an example, during the week of March 30, numerous orders were delayed or rescheduled because SMNI was unable to acquire vital information in order to properly provision service to its customers.

A second source of concern is that SMNI has been informed by the Birmingham LCSC that there are only three individuals in their office that are able to properly accept and process SMNI orders. At one point, of the three, two were out of the office, leaving only one person to handle the entire work load. Even when specific orders were escalated, the responses by BellSouth included, "I have found your ASRs and will have Nancy process them when she returns on Monday." This was an escalation on Thursday, 4/3 for an order due 4/10. (Nancy was returning on 4/7.) Another response provided to SMNI was, "I have ten of your (SMNI) orders on my desk. Which one do you want first?"